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**KRASKIN, LESSE & COSSON, LLC**  
ATTORNEYS AT LAW  
TELECOMMUNICATIONS MANAGEMENT CONSULTANTS

ORIGINAL

2120 L Street, N.W., Suite 520  
Washington, D.C. 20037

Telephone (202) 296-8890  
Telecopier (202) 296-8893

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March 24, 2003

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

Re: Pine Belt PCS, Inc. and Pine Belt Cellular, Inc.  
Petition for Waiver of Sections 20.12(c) and 52.31(a)(2) of the  
Commission's Rules  
CC Docket Nos. 99-200 & 95-116; WT Docket No. 01-184  
Ex Parte Presentation - Bi-Monthly Status Report Pursuant to Petition for  
Waiver

Dear Ms. Dortch:

On November 22, 2002, Pine Belt PCS, Inc. and Pine Belt Cellular, Inc. (collectively "Pine Belt Wireless") submitted a Petition for Waiver seeking temporary extension of the requirement for Commercial Mobile Radio Service providers to support roaming with customers with pooled numbers, as set forth in Section 20.12(c) and 52.31(a)(2) of the Commission's Rules (CC Docket Nos. 99-200 & 95-116; WT Docket No. 01-184). In its Petition, Pine Belt Wireless committed to providing the Commission with bi-monthly status reports during the temporary extension period. Transmitted herewith on behalf of Pine Belt Wireless is its second bi-monthly status report.

Please contact the undersigned with any questions regarding this matter

Respectfully submitted,



John Kuykendall  
Its Attorney

Attachment

cc: Blaise Scinto, Chief, Policy Division, Wireless Telecommunications Bureau  
Patrick Forster, Policy Division, Wireless Telecommunications Bureau  
Jared Carlson, Policy Division, Wireless Telecommunications Bureau  
Qualex International

No. of Copies 04  
DATE 03/24/03

**PINE BELT PCS, INC. AND PINE BELT CELLULAR, INC.  
BI-MONTHLY STATUS REPORT PURSUANT TO REQUEST FOR WAIVER  
OF REQUIREMENT FOR CMRS PROVIDERS TO SUPPORT ROAMING FOR  
CUSTOMERS WITH POOLED NUMBERS**

**March 24, 2003**

On November 22, 2002, Pine Belt PCS, Inc. and Pine Belt Cellular, Inc. (collectively "Pine Belt Wireless") filed a Petition for Waiver seeking temporary extension, until November 23, 2003, of the requirement for Commercial Mobile Radio Service ("CMRS") providers to support roaming with customers with pooled numbers ("Petition"). The Petition is currently pending before the Commission.

In its January bi-monthly status report, Pine Belt Wireless committed to providing information regarding PSAP procedure in handling dropped calls, the percentage of roaming traffic that comes from the company's major roaming partners serving in the top 100 MSAs, and the extent to which company's major roaming partners mirror the Mobile Identification Number ("MIN") and the Mobile Directory Number ("MDN") (resulting in full call back information being provided to the PSAP). This information was provided in reply comments filed by Pine Belt Wireless on February 27, 2003 in response to the Public Notice. Additional information is provided in this report.

Pine Belt Wireless reports that a procedure is in place whereby the company is notified within 24 hours after a PSAP has experienced difficulty with handling a call that is associated with Pine Belt Wireless' network. This includes notification of problems associated with calling back a roamer after a call has been dropped. Since the initiation of the Commission's number pooling requirements, Pine Belt Wireless has not received any notifications from the four PSAPS of problems relating to calling back roamers.

In reply comments submitted in response to the Public Notice, Pine Belt Wireless reported that approximately 49 percent of its roaming traffic comes from markets that are outside of the top 100 MSAs and another 41.6 percent comes from two of its major roaming partners, ALLTEL in the Mobile market (approximately 22 percent of all roaming traffic) and Cingular in the Birmingham market (approximately 19.6 percent of all roaming traffic).<sup>2</sup> ALLTEL and Cingular have informed Pine Belt Wireless that they

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<sup>1</sup> See *Wireless Telecommunications Bureau Seeks Comment on Petitions for Extension of the Deadline for Support of Roaming by Wireless End-Users with Ported or Pooled Numbers: Public Notice*, CC Docket Nos. 99-200 & 95-200; WT Docket No. 01-184; DA 03-148 (rel. Jan. 16, 2003) ("Public Notice") (FCC seeking comment on Pine Belt Wireless' petition).

<sup>2</sup> See Reply Comments of Pine Belt PCS, Inc. and Pine Belt Cellular, Inc., CC Docket Nos. 99-200 & 95-116, WT Docket No. 01-184, filed Feb. 27, 2003 at 7. This data was derived from an analysis of roaming traffic from the period October 26, 2002 through November 26, 2002. The data was compared with data from three other

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**PINE BELT WIRELESS BI-MONTHLY REPORT**

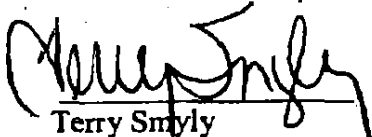
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match the MIN and MDN in all cases unless it is not technically possible ~~in~~ the context of pooling. Two other major roaming partners that serve the top 100 MSAs, Verizon Wireless and Cellular South, have also informed Pine Belt Wireless that they mirror the MIN and MDN in all cases where technically feasible. Accordingly, for over 90 percent of its roamers, a MIN/MDN mismatch is highly unlikely to occur.

No further developments have occurred since the date Pine Belt Wireless filed its reply comments.

Respectfully Submitted,



Terry Smyly  
Customer Service Manager

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consecutive billing cycles which showed that the percentages are fairly consistent over the four month period.